

LAURA SKOP :

Plaintiff, :

v. :

CITY OF ATLANTA, GEORGIA, :

OFFICER TIMOTHY BROWN, :

in his individual capacity, & :

SERGEANT THOMAS L. :

PADGETT, in his individual :

capacity, :

Defendants. :

CIVIL ACTION

FILE NO.: 1:05-CV-1754-BBM

Declaration of Laura Lee Skop Exhibit “A”

Deposition of Timothy Scott Brown (*Cited Pages Only*) Exhibit “B”

Deposition of Thomas L. Padgett (*Cited Pages Only*) Exhibit “C”

Deposition of Welcome Harris, Jr. (*Cited Pages Only*) Exhibit “D”

Deposition of Joseph P. Spillane (*Cited Pages Only*) Exhibit “E”

Deposition of Darrell Alphonso Lester (*Cited Pages Only*) Exhibit “F”

Deposition of Cerrine LaShon Leeks (*Cited Pages Only*) Exhibit “G”

Deposition of Laura Skop (*Cited Pages Only*) Exhibit “H”

DOCUMENTARY EVIDENCE

1. Zone 2 Evening Watch Assignment Sheet (7/10/03)
2. Atlanta Police Dept. – Daily Activity Report (7/10/03)
3. Request for Tape Recordings (7/17/03)
4. Map of Scene of Incident
5. Citation (7/10/03)
6. Incident Report (7/10/03)
7. APD Vehicle Record/Impound Report (7/10/03)
8. Picture
9. Picture
10. Picture
11. Picture
12. APD Employee Discipline Worksheet (12/9/03)
13. Memo from Lt. M. Hendricks to Major W. Harris (9/25/03)
Re: Investigation & Disposition of Complaint 03-C-0309-UAF
14. Memo to Lt. M. Hendricks Re: Information/Witnesses, etc. to
Complaint 03-C-0309-UAF

15. Memo from Lt. M. Hendricks to Major W. Harris (10/10/03
Re: Investigation & Disposition of Complaint 03-C-0309-UAF
16. APD Citizen Statement (Dr. John Lloyd) (10/30/03)
17. Memo from Deputy Chief Harold Dunovant to Assistant Chief Alan Dreher
Re: OPS Complaint File # 03-C-0309-UAF, Officer Timothy Brown
18. Letter from Laura Skop to Gary Cox (7/11/03)
19. Letter from Major W. Harris to Laura Skop (3/3/04)
20. Letter from Laura Skop to Richard Pennington, Chief of Police (3/23/04)
21. Memo from Major W. Harris to Assistant Chief A. Dreher (Chief of
Operations (5/5/04) Re: Citizen Complaint - Laura Skop
22. Memo from Major Harris to APD Command Staff (5/4/04)
Re: Use of Vacation Day sin Lieu of Suspension
23. Letter from Richard Pennington (Chief) to Laura Skop (5/6/04)
24. *Intentionally omitted.*
25. *Intentionally omitted.*
26. *Intentionally omitted.*
27. APD Notice of Proposed Adverse Action; Brown,12/30/03
28. APD Notice of Proposed Adverse Action; Brown,1/7/04
29. APD Notice of Proposed Adverse Action; Brown,1/20/03

30. Memo from Major Spillane to File 03-C-0309-UAF
Re: Re-issuance of NPAA/NFAA
31. APD Notice of Proposed Adverse Action; Brown, 1/26/04
32. APD Letter of Written Reprimand; Brown, 1/26/04
33. Memo from Major Spillane to Officer Brown (1/26/04)
Re: Oral Admonishment
34. ***Intentionally omitted.***
35. Zone 2 Evening Watch Assignment Sheet (7/10/03)
36. APD Policy Manual (effective 7/1/04; revised 11/1/04)
37. ***Intentionally omitted.***
38. Application for Employment (Timothy Brown; 8/15/00)
39. Personnel Transaction & Certification (Timothy Brown; 8/00)
40. Georgia POST Counsel – Officer’s Training Transcript (Brown; 11/9/05)
41. ***Intentionally omitted.***
42. Disciplinary Complaint History (Brown)
43. APD – QPAI Performance Appraisal Form (Brown; 4/1/02)
44. APD – QPAI Performance Appraisal Form (Brown; 6/10/03)
45. APD – QPAI Performance Appraisal Form (Brown; 5/15/04)
46. APD Field Manual

47. ***Intentionally omitted.***
48. ***Intentionally omitted.***
49. Training Courses Schedule
50. Course: Basic Mandate; Title: Mechanics of Arrest (Manual)
51. ***Intentionally omitted.***
52. Memo re: Criminal Subpoena for Production of Docs (7/21/05)
53. Letter from Solicitor to Laura Skop re: Traffic Citations (7/15/03)
54. APD Employee Statement (Padgett; 8/5/03)
55. Civil Service Appeal (Testimony of Major Spillane)
56. APD Citizen Statement (Laura Skop; 7/24/03)
57. Civil Service Appeal (Testimony of Laura Skop)
58. APD Citizen Statement (Doug Kollme; 8/1/03)
59. APD Citizen Statement (Dr. John Lloyd; 7/29/03)
60. Statement of Charles Schroeder (8/4/03)
61. Diagram of Zone 2 Precinct
62. Civil Service Appeal (Testimony of Charles Schroeder)
63. Map of Zone 2
64. Unit History for 3205

65. Unit History for 3215
66. Unit History for 3210
67. Contents for Basic Mandate: Traffic Direction and Control
68. Roll Call Training Issue
69. GA POST Profile Report for Thomas L. Padgett
70. GA POST Profile Report for Welcome Harris, Jr.
71. GA POST Profile Report for Joseph P. Spillane
72. GA POST Profile Report for Harold R. Dunovant
73. GA POST Profile Report for Gina V. Hawkins
74. GA POST Profile Report for Melvin L. Hendricks
75. GA POST Profile Report for Darrell A. Lester
76. Picture
77. Picture
78. Picture
79. Picture
80. Picture
81. Picture
82. Picture

83. Picture